

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

BLUE CROSS AND BLUE SHIELD OF
VERMONT and THE VERMONT HEALTH
PLAN,

Plaintiffs,

v.

TEVA PHARMACEUTICAL INDUSTRIES
LTD., TEVA PHARMACEUTICALS USA, INC.,
TEVA SALES AND MARKETING, INC., and
TEVA NEUROSCIENCE, INC.,

Defendants.

Civil Action No. 5:22-cv-00159-gwc

**JOINT MOTION FOR EXTENSION OF TIME TO FILE ESI PROTOCOL AND
STIPULATED PROTECTIVE/CONFIDENTIALITY ORDER UNDER THE
STIPULATED DISCOVERY SCHEDULE/ORDER (ECF NO. 52)**

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7, the parties respectfully request a two-week extension of time, until **February 27, 2023**, to file an ESI Protocol and a Stipulated Protective/Confidentiality Order as required by the Stipulated Discovery Schedule/Order (ECF No. 52) entered by the Court. The parties are currently reviewing drafts of the aforementioned documents, have exchanged various revisions and comments, and will be meeting and conferring to finalize the documents. Good cause exists for the requested extension as it will allow the parties sufficient time to work through any remaining issues concerning the ESI Protocol and Stipulated Protective/Confidentiality Order in the most efficient manner without extending or impacting any other deadlines in the Stipulated Discovery Schedule/Order.

WHEREFORE, the parties respectfully request that the Court grant their motion for an extension of time as indicated herein.

Dated: February 10, 2023

Respectfully submitted,

By: /s/ Michael Donofrio

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LOCAL RULE 7(a)(7) CERTIFICATION

The undersigned certifies that counsel for the parties conferred in good faith and have reached agreement as to the relief requested in this Motion.

/s/ Matthew S. Borick

IT IS SO ORDERED:

Date

Gregory W. Crawford, U.S. District Court Judge

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